

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

LIDIETH MOJICA)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:15cv1110 (LMB/TCB)
)	
)	
SWIFTSIPS, LLC, <i>et al.</i>)	
)	
Defendants.)	
)	

**MEMORANDUM IN SUPPORT OF CONSENT
MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff Lideith Mojica (“Ms. Mojica”) and Defendants Swiftships LLC (“Swiftships”), Khurram Shah, Calvin Leleux, and Jeffrey Leleux, by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 26(c) and Local Civil Rule 7, have moved the Court for entry of a stipulated Protective Order and, in support of their motion, aver as follows:

1. This case arises from Ms. Mojica’s employment with Swiftships. Ms. Mojica has alleged a hostile work environment in violation of Title VII against Swiftships as a result of sexual harassment she was subjected to by Swiftships’ CEO Shehraz Shah. Ms. Mojica has also alleged Retaliation in Violation of Title VII and Discharge on the Basis of Gender against Swiftships due to Swiftships’ termination of her employment in retaliation for complaining about a hostile work environment. Against all Defendants, Ms. Mojica has alleged Virginia state law claims of negligent failure to warn and negligent retention for exposing her to a hostile work environment caused by Swiftships’ CEO Shehraz Shah’s sexual harassment. Defendants dispute the allegations and intend to vigorously defend this case. In light of the nature of the allegations, the parties anticipate that discovery in this matter will involve highly sensitive

financial and personal information about Ms. Mojica, Shehraz Shah, other employees of Swiftships, and other non-parties, which they would not voluntarily disclose publicly.

2. Federal Rule of Civil Procedure 26(c) provides that the Court may, for good cause shown, “issue an order . . . specifying terms . . . for the disclosure or discovery” and “requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way[.]” Here, a protective order governing the parties’ exchange of information in discovery is necessary and appropriate, as discovery is likely to involve highly personal information about the individual parties, other Swiftships employees and affiliates, as well as sensitive financial and proprietary information about Swiftships, itself.

3. Entry of the stipulated Protective Order will enable the parties to designate such highly personal and commercially sensitive information as “Confidential,” and the Protective Order will protect such information from further disclosure, except in accordance with its terms. The parties recognize and understand that filings with the Court are presumptively public, and they will adhere to the requirements of Local Civil Rule 5 to the extent it is necessary or appropriate to seek leave of Court to submit a filing under seal.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court enter the Protective Order submitted with their Consent Motion for Entry of Protective Order.

Dated: October 14, 2015

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October 2015, a true and correct copy of the foregoing will be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following counsel of record:

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